

REMARKS

The non-final Office Action was issued on pending claims 16-50. Claims 16-38 stand rejected and claims 39-50 stand withdrawn from consideration. In this Response, claims 16 and 34 have been amended and no claims have been cancelled or added. Thus, claims 16-38 are pending and under consideration and claims 39-50 are pending and withdrawn from consideration.

~~Applicant invites the Examiner to call Applicant's Representative to discuss any issues~~
with this application.

Claim Rejections – 35 U.S.C. § 103

In Office Action paragraph 3, claims 16-17, 24, 27, 30-32, 34 and 36-37 were rejected under 35 U.S.C. § 103(a) as being unpatentable over *Baldini et al.* (US 4,656,813) in view of *Kodera* (US 4,396,582). In Office Action paragraph 4, claims 18-20, 28-29 and 35 were rejected under 35 U.S.C. § 103(a) as being unpatentable over *Baldini et al.* in view of *Kodera* and further in view of *Duffey et al.* (US 5,129,212). In Office Action paragraph 5, claims 21-22 and 38 were rejected under 35 U.S.C. § 103(a) as being unpatentable over *Baldini et al.* in view of *Kodera* and *Duffy et al.* and further in view of *Madsen* (US 3,451,403). In Office Action paragraph 6, claim 23 was rejected under 35 U.S.C. § 103(a) as being unpatentable over *Baldini et al.* in view of *Kodera* and further in view of *Ogata* (GB 2142282 A). In Office Action paragraph 7, claims 25-26 were rejected under 35 U.S.C. § 103(a) as being unpatentable over *Baldini et al.* in view of *Kodera* and further in view of *Brennan et al.* (US 4,587,793). In Office Action paragraph 8, claim 33 was rejected under 35 U.S.C. § 103(a) as being unpatentable over *Baldini et al.* in view of *Kodera* and further in view of *Aindow et al.* (US 5,934,043). Applicant respectfully disagrees.

Applicant's invention is claimed in independent claims 16 and 34 pertains to a method of forming flexible plastic containers and filling with infusion-type solutions. Claims 16 and 34 have been amended to clarify the claims, particularly the dry cleaning steps have been clarified. The dry cleaning steps call for dry cleaning the printed film by directing a gas from a gas applicator toward and across a surface of the film and flowing particles removed from the surface and the gas out through a nozzle juxtaposed the gas applicator such that the film is not touched during dry cleaning.

One example of Applicant's claimed dry cleaning step is shown in Figs. 2D and 2C. The printed film FST is dry cleaned by directing a gas from a gas applicator 104, 107 toward and across surfaces of the film FST. Particles removed from the surfaces of the film FST and the gas are flowed out through nozzles 103, 105, 106, 108 juxtaposed the gas applicator 104, 107. The film FST is not touched during dry cleaning and the claimed film is designated as FSTL.

Applicant respectfully submits that the cited references, alone or in combination, do not disclose or suggest Applicant's claimed invention, particularly the dry cleaning step.

Baldini et al. shows in Fig. 1 a washing sequence 3 having an ultrasonic cleaning unit 3a and a distilled water washing unit 3b. See *Baldini et al.*, column 2, lines 41-52. The Office Action at page 2 acknowledges that *Baldini et al.* does not describe dry cleaning the printed film.

Kodera pertains to a method and apparatus for sterilizing food packages or the like. The purported invention of *Kodera* essentially is the combined use of non-toxic sterilizing liquid and ultraviolet radiation to sterilize the food package or object. See *Kodera*, column 1, line 66 – column 2, line 9.

The Office Action at page 3 asserts that *Kodera* teaches a dry cleaning procedure of a packaging film with purified/filtered air and refers to Fig. 5 and pump 84. However, Fig. 5 of *Kodera* pertains to liquid cleaning of a film and does not show dry cleaning of a film. A pair of nozzles 74 spray reconditioned liquid onto both surfaces of a strip P. The strip P merges from sterilizing liquid 16 in a liquid sterilizing vessel 14 and then is sprayed with the reconditioned liquid by the nozzles 74. Spraying of the reconditioned liquid onto the strip P washes the strip clean of dust particles or the like. See *Kodera*, column 12, lines 7-17. Downstream of the liquid-cleaned strip P, air knives 82 remove the liquid from both surfaces of the strip P. A dryer 88 downstream of the liquid removing air knives 82 dries the strip P. See *Kodera*, column 12, lines 22-27. Accordingly, *Kodera* shows in Fig. 5 liquid cleaning of the strip P and not dry cleaning of the strip P. The *Kodera* air knives 82 and the dryer 88 merely remove the cleaning liquid and dry the strip P.

Furthermore, Applicant's dry cleaning step of claims 16 and 34 call for flowing particles removed from the surface and the gas out through a nozzle. Conversely, *Kodera* shows in Fig. 5 discharging liquid containing dust and other foreign matter washed from the strip P by removing the "dirty" liquid through a liquid discharge conduit 80. See *Kodera*, column 12, lines 17-21.

Even further, Applicant's dry cleaning step of claims 16 and 34 call for flowing particles removed from the surface and the gas out through a nozzle juxtaposed the gas applicator such that the film is not touched during dry cleaning. One example of Applicant's flowing particles removed from the surface and the gas out through a nozzle juxtaposed the gas applicator is shown in Figs. 2B and 2C. Nozzle 104 applies cleaning gas to remove particles from the surface of the film FST. The gas and the particles flow out through a nozzle 103 juxtaposed the nozzle (gas-applicator) 104. ~~Nowhere does Koderá show in Fig. 5 flowing particles removed from the strip P and the filtered air out through a nozzle juxtaposed liquid-removing air knives 82 or the dryer 88.~~

Fig. 6 of *Koderá* shows a dust remover 150 having brushes 156 which contact the strip P. See *Koderá*, column 12, lines 37-58. Conversely, Applicant's claimed dry cleaning step cleans the film such that the film is not touched during dry cleaning.

Fig. 7 of *Koderá* shows a heater 160 having a pair of ultrasonic humidifiers 166 which moisten the surfaces of the strip P. See *Koderá*, column 12, line 67 – column 13, line 3. Thus, Fig. 7 of *Koderá* does not show dry cleaning the strip P.

Fig. 8 of *Koderá* shows liquid cleaning of the strip P, air knives 82a for removal of liquid, and air inlets 174 for drying the strip P. See *Koderá*, column 13, lines 5-51. Accordingly, Fig. 8 of *Koderá* does not show Applicant's claimed dry cleaning step.

As to *Duffy et al.*, *Madsen*, *Ogata*, *Brennan et al.* and *Aindow et al.*, Applicant respectfully submits that those references do not remedy the deficiencies of *Baldini et al.* and *Koderá*.

Thus, Applicant respectfully submits that the § 103 rejections have been overcome.

CONCLUSION

For the foregoing reasons, Applicant submits that the patent application is in condition for allowance and requests a Notice of Allowance be issued.

Respectfully submitted,

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